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November 21, 2014

Ralph J. Reissman, Esq.
Deputy County Attorney
Office of the Nassau County Attorney
One West Street
Mineola, New York 11501

Re: Panzella et al. v. County of Nassau et. al.
13 -CV-5640 (SJF)(SIL) (United States District Court, E.D.N.Y.)

Dear Mr. Reissman:

We write this letter to reject your Answer filed as Document 56 in the above referenced action. First, it is improperly dated November 21, 2013. More importantly, pursuant to Fed. R. Civ. P. 12(a)(4)(A), the Answer was due 14 days after Judge Feuerstein terminated your motion on July 9, 2014 conference. (See Document No.4). Thus your answer was due on July 24, 2014. Since then there has been no request for an extension of time.

Most troubling, you assert numerous Affirmative Defenses that have not previously been asserted in your Motion to Dismiss, and are thus waived, including, but not limited to Affirmative Defense numbers 1, 5 and 9 through 17. As such, we cannot accept the filing of this improper and late Answer.

Very truly yours,

Robert J. La Reddola

RJL:ca